IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. 23-

v. : DATE FILED: August 22, 2023

WILLIAM POWELL : VIOLATIONS:

26 U.S.C. § 7201 (tax evasion - 5

: counts

26 U.S.C. § 7203 (failure to file return

= -2 counts

INDICTMENT

COUNT ONE (Tax Evasion for 2014)

THE GRAND JURY CHARGES THAT:

- During the calendar year 2014, defendant WILLIAM POWELL received taxable income, upon which there was an income tax due and owing to the United States of America.
- From on or about January 1, 2014, through on or about May 8, 2019, in the Eastern District of Pennsylvania, and elsewhere, defendant

WILLIAM POWELL,

a resident of Philadelphia, Pennsylvania, willfully attempted to evade and defeat an income tax due and owing by him to the United States of America for the calendar year 2014 by failing to make an income tax return on or about April 15, 2015, as required by law, to any proper officer of the Internal Revenue Service, and by failing to pay the Internal Revenue Service this income tax, and by concealing and attempting to conceal from all proper officers of the United States of America his true and correct income through various means, including, among other things:

- a. by concealing sources and amounts of his true and correct income by using a nominee to conceal his financial interest in and receipt of income from a cleaning company known to the grand jury (the "Cleaning Company");
- b. by concealing sources and amounts of his true and correct income by operating largely in cash; and
- c. by concealing sources and amounts of his true and correct income by making false and deceptive statements to federal agents during an investigation.

COUNT TWO (Tax Evasion for 2015)

THE GRAND JURY FURTHER CHARGES THAT:

- During the calendar year 2015, defendant WILLIAM POWELL received taxable income, upon which there was an income tax due and owing to the United States of America.
- 2. From on or about January 1, 2015, through on or about May 8, 2019, in the Eastern District of Pennsylvania, and elsewhere, defendant

WILLIAM POWELL,

a resident of Philadelphia, Pennsylvania, willfully attempted to evade and defeat an income tax due and owing by him to the United States of America for the calendar year 2015 by failing to make an income tax return on or about April 18, 2016, as required by law, to any proper officer of the Internal Revenue Service, and by failing to pay the Internal Revenue Service this income tax, and by concealing and attempting to conceal from all proper officers of the United States of America his true and correct income through various means, including, among other things:

- a. by concealing sources and amounts of his true and correct income by using a nominee to conceal his financial interest in and receipt of income from a cleaning company known to the grand jury (the "Cleaning Company");
- b. by concealing sources and amounts of his true and correct income by operating largely in cash; and
- c. by concealing sources and amounts of his true and correct income by making false and deceptive statements to federal agents during an investigation.

COUNT THREE (Tax Evasion for 2016)

THE GRAND JURY FURTHER CHARGES THAT:

- During the calendar year 2016, defendant WILLIAM POWELL received taxable income, upon which there was an income tax due and owing to the United States of America.
- 2. From on or about January 1, 2016, through on or about May 8, 2019, in the Eastern District of Pennsylvania, and elsewhere, defendant

WILLIAM POWELL,

a resident of Philadelphia, Pennsylvania, willfully attempted to evade and defeat an income tax due and owing by him to the United States of America for the calendar year 2016 by failing to make an income tax return on or about April 18, 2017, as required by law, to any proper officer of the Internal Revenue Service, and by failing to pay the Internal Revenue Service this income tax, and by concealing and attempting to conceal from all proper officers of the United States of America his true and correct income through various means, including, among other things:

- a. by concealing sources and amounts of his true and correct income by using a nominee to conceal his financial interest in and receipt of income from a cleaning company known to the grand jury (the "Cleaning Company");
- b. by concealing sources and amounts of his true and correct income by operating largely in cash; and
- by concealing sources and amounts of his true and correct income
 by making false and deceptive statements to federal agents during an investigation.

COUNT FOUR (Tax Evasion for 2017)

THE GRAND JURY FURTHER CHARGES THAT:

- During the calendar year 2017, defendant WILLIAM POWELL received taxable income, upon which there was an income tax due and owing to the United States of America.
- 2. From on or about January 1, 2017, through on or about May 8, 2019, in the Eastern District of Pennsylvania, and elsewhere, defendant

WILLIAM POWELL,

a resident of Philadelphia, Pennsylvania, willfully attempted to evade and defeat an income tax due and owing by him to the United States of America for the calendar year 2017 by failing to make an income tax return on or about April 17, 2018, as required by law, to any proper officer of the Internal Revenue Service, and by failing to pay the Internal Revenue Service this income tax, and by concealing and attempting to conceal from all proper officers of the United States of America his true and correct income through various means, including, among other things:

- a. by concealing sources and amounts of his true and correct income by using a nominee to conceal his financial interest in and receipt of income from a cleaning company known to the grand jury (the "Cleaning Company");
- b. by concealing sources and amounts of his true and correct income
 by operating largely in cash; and
- by concealing sources and amounts of his true and correct income
 by making false and deceptive statements to federal agents during an investigation.

COUNT FIVE (Tax Evasion for 2018)

THE GRAND JURY FURTHER CHARGES THAT:

- During the calendar year 2018, defendant WILLIAM POWELL received taxable income, upon which there was an income tax due and owing to the United States of America.
- 2. From on or about January 1, 2018, through on or about May 8, 2019, in the Eastern District of Pennsylvania, and elsewhere, defendant

WILLIAM POWELL,

a resident of Philadelphia, Pennsylvania, willfully attempted to evade and defeat an income tax due and owing by him to the United States of America for the calendar year 2018 by failing to make an income tax return on or about April 15, 2019, as required by law, to any proper officer of the Internal Revenue Service, and by failing to pay the Internal Revenue Service this income tax, and by concealing and attempting to conceal from all proper officers of the United States of America his true and correct income through various means, including, among other things:

- a. by concealing sources and amounts of his true and correct income by using a nominee to conceal his financial interest in and receipt of income from a cleaning company known to the grand jury (the "Cleaning Company");
- b. by concealing sources and amounts of his true and correct income by operating largely in cash; and
- by concealing sources and amounts of his true and correct income
 by making false and deceptive statements to federal agents during an investigation.

COUNT SIX (Failure to File Tax Return for 2017)

THE GRAND JURY FURTHER CHARGES THAT:

- 1. During the calendar year 2017, defendant WILIAM POWELL had and received gross income substantially in excess of the minimum filing requirement, that is, \$4,050.
- 2. By reason of such gross income, defendant WILLIAM POWELL was required by law, following the close of calendar year 2017 and on or before April 17, 2018, to make an income tax return to any proper officer of the Internal Revenue Service, stating specifically the items of his gross income and any deductions and credits to which he was entitled.
- 3. On or about April 17, 2018, in the Eastern District of Pennsylvania, and elsewhere, defendant

WILLIAM POWELL,

a resident of Philadelphia, Pennsylvania, well knowing and believing all of the foregoing, willfully failed to make an income tax return.

COUNT SEVEN (Failure to File Tax Return for 2018)

THE GRAND JURY FURTHER CHARGES THAT:

- During the calendar year 2018, defendant WILLIAM POWELL had and received gross income substantially in excess of the minimum filing requirement, that is, \$5.
- 2. By reason of such gross income, defendant WILLIAM POWELL was required by law, following the close of calendar year 2018 and on or before April 15, 2019, to make an income tax return to any proper officer of the Internal Revenue Service, stating specifically the items of his gross income and any deductions and credits to which he was entitled.
- 3. On or about April 15, 2019, in the Eastern District of Pennsylvania, and elsewhere, defendant

WILLIAM POWELL,

a resident of Philadelphia, Pennsylvania, well knowing and believing all of the foregoing, willfully failed to make an income tax return.

In violation of Title 26, United States Code, Section 7203.

A TRUE BILL:

GRAND JURY FOREPERSON

JACQUELINE C. ROMERO UNITED STATES ATTORNEY

No.

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

VS.

WILLIAM POWELL

INDICTMENT

26 U.S.C. § 7201 (tax evasion – 5 counts) 26 U.S.C. § 7203 (failure to file return – 2 counts)

